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*Counsel for Ad Hoc Group of Subrogation
Claim Holders*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

**All papers shall be filed in the lead case, No.
19-30088 (DM)*

**THE OFFICIAL COMMITTEE OF TORT
CLAIMANTS,**

Plaintiff,

Case No. 19-30088

Chapter 11

(Lead Case)

(Jointly Administered)

Adversary Proceeding No. 19-03053

**STIPULATION RE: DEADLINE TO
FILE RESPONSE TO ADVERSARY
COMPLAINT**

[No Hearing Requested]

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v.
THE AD HOC GROUP OF SUBROGATION
CLAIM HOLDERS,
Defendant.

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 The Official Committee of Tort Claimants (the “TCC”) and the Ad Hoc Group of
3 Subrogation Claim Holders (the “Ad Hoc Subrogation Group” and, together with the TCC, the
4 “Parties”), hereby reach the following stipulation as to the deadline for the Ad Hoc Subrogation
5 Group’s response to the TCC’s Adversary Complaint in the above captioned case.

6 **STIPULATION**

7 WHEREAS on November 08, 2019, the TCC filed a Complaint for Declaratory
8 Judgement Subordinating and Disallowing Claims and for an Accounting, [Dkt. 1] (the “TCC
9 Complaint”) against the Ad Hoc Subrogation Group in this Court;

10 WHEREAS on November 12, 2019, this Court issued a Summons and Notice of
11 Scheduling Conference In an Adversary Proceeding [Dkt. 2] (the “Summons”), requiring the Ad
12 Hoc Subrogation Group to file a motion or answer the TCC Complaint within 30 days of issuance
13 of the summons;

14 WHEREAS 30 days from the issuance of Summons is December 12, 2019 (the Response
15 Deadline);

16 WHEREAS the Ad Hoc Subrogation Group has requested that the Response Deadline
17 be extended until December 19, 2019, and the TCC has agreed to such an extension;

18 THEREFORE the parties agree as follows:

- 19 **1.** The Parties agree to extend the Response Deadline to December 19, 2019.

20 So stipulated:
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1 Dated: December 10, 2019

WILLKIE FARR & GALLAGHER LLP

2 /s/ Benjamin P. McCallen

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Counsel for Ad Hoc Group of Subrogation Claim Holders

19 Dated: December 10, 2019

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